

March 11, 2003

*Via e-mail*

Greg Lyssy

U.S. EPA Region 6

1445 Ross Avenue

Dallas, TX 57202-2733

Subject: Management of Drilling Fluids Generated on Private Lands near  
Camp Stanley Storage Activity - Boerne, Texas  
Parsons ES job number 740911-04000

Mr. Lyssy:

On behalf of Camp Stanley Storage Activity (CSSA), Parsons respectfully submits for your concurrence on our proposed management plan for handling fluids and sediments that are to be generated while drilling at an off-post location, 25490 Old Fredericksburg Road. Specifically, this is a ranch property adjacent to CSSA to the southwest, and has had detections of PCE in their domestic well (RFR-10) in the past. Parsons will be installing wells into a primary aquifer, portions of which are known to be contaminated, to better characterize the nature and extent of solvents in off-post groundwater.

Because we have been installing surface casing on most wells, the drilling has been following a phased approach whereby a single hydrogeologic interval is penetrated at one time. This conservative approach has allowed us to ensure that chances of cross-contamination are minimized, and each hydrogeologic interval can be characterized independently. As a generalized assessment, our findings indicate that the Cow Creek is fairly productive and typically free of contaminants, the Bexar Shale is quite impermeable and contaminant free, and the Lower Glen Rose yields significant quantities of groundwater and is usually contaminated near source areas.

During the current on-post investigation, we essentially have been treating nearly all generated fluids from the Lower Glen Rose portion of the aquifer at the TPDES Outfall 002, which is CSSA's GAC unit. Wells drilled in the vicinity of SWMU B-3 have almost unanimously demonstrated that the Lower Glen Rose portion of the aquifer is contaminated with PCE, TCE, and other breakdown/daughter products. It has been easier and more efficient to treat all generated water from that interval rather than perform individual characterizations of each storage container. When discrete interval groundwater sampling using a double-packer system indicates that the Bexar Shale and/or Cow Creek are free of contaminants, those waters, after the solids have been allowed to settle out, have been generally discharged to the ground surface for eventual infiltration. Once the well is completed, sediments from the rolloffs and containment pit are analyzed for VOCs. Thus far, all sediments have been found to be contaminant-free, and are therefore deposited in a centralized location within the post.

Our management of off-post drilling fluids and sediments will follow the approach currently implemented on-post following our Waste Management Plan, which was previously approved by EPA. Parsons will provide roll-off boxes to contain the fluids during drilling. Characterization of the drilling interval (e.g.; Lower Glen Rose, Bexar Shale, and Cow Creek) will be made during the

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coring phase of the well installation. Typically during 4-inch coring, an entire interval can be contained in a single roll-off container, thereby providing a composite sample of what is to be expected when the same interval is reamed at larger diameters. The drilled interval will be further characterized by the implementation of discrete interval groundwater samples collected using the double-packer system. If both of these checks show that the interval produces groundwater less than TRRP PCLs and Federal MCLs, then all groundwater from that interval will be discharged to the surface. It will be assumed that the fluids generated during the coring are representative of groundwater that will be generated during the reaming phase of the same hydrogeologic interval, which can also be discharged to the ground surface.

However, if any hydrologic unit generates contaminated groundwater above MCLs and PCLs either during the coring or discrete interval groundwater screening, those waters will be contained and transported to CSSA for treatment at Outfall 002. We intend to use the drilling subcontractor to transport the fluids back to CSSA. With the blessing of the property owner, we have hopes of constructing a temporary gate across from the CSSA main gate thereby virtually eliminating transport over public roads. The sediments will be characterized by VOC analysis. Clean sediments will be left on-site and managed to the satisfaction of the property owner. Likewise, contaminated solids will be profiled and disposed at a permitted landfill.

If you have questions or comments regarding this approach, please contact me at 512-719-6087.

Sincerely,



Scott Pearson  
Task Manager

cc: Brian Murphy, CSSA  
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740911 Project File